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FILED.

DATED: 3:49 pm, August 06, 2020

U.S. MAGISTRATE JUDGE

Representing the United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEANETTE RENEE WALLACE,

Defendant.

Case No. 2:20-mj-00657-DJA

COMPLAINT FOR VIOLATION OF:

Count One:
Depredation Against Property of the
United States – 18 U.S.C. § 1361

BEFORE the Honorable Daniel J. Albregts, United States Magistrate Judge, Las Vegas, Nevada, the undersigned complainant being first duly sworn states:

Count One

(Depredation Against Property of the United States)

On or about May 30, 2020, in the State and Federal District of Nevada,

JEANETTE RENEE WALLACE,

1 defendant herein, willfully and by means of kicking and throwing rocks and other objects and
2 paint, did injure and commit a depredation against property of the United States and of any
3 department or agency thereof, and property which had been manufactured and constructed
4 for the United States, and any department or agency thereof, specifically the Foley Federal
5 Building, 300 South Las Vegas Boulevard, Las Vegas, Nevada 89101, and the resulting
6 damage was over one thousand dollars (\$1000.00), all in violation of Title 18, United States
7 Code, Section 1361.

8 **PROBABLE CAUSE AFFIDAVIT**

9 1. Your Complainant is a Special Agent ("SA") with the Federal Bureau of
10 Investigation ("FBI"), has been so employed for over two and a half years, and is currently
11 assigned to the Las Vegas Field Office. Prior to this, he was employed as a police officer in
12 Minnesota for fourteen years. As an FBI Agent, your Complainant is assigned to the FBI's
13 Las Vegas Violent Crimes Task Force and is responsible for investigating a variety of
14 violent crimes, to include bank robbery, kidnapping, extortion, robbery, carjackings,
15 assaults and murders of federal officers, racketeering related violent offenses, as well as
16 long-term investigations into the activities and operations of career criminals, criminal
17 enterprises, drug trafficking organizations, and violent street gangs. Your Complainant has
18 experience in conducting criminal investigations, including the investigation of criminal
19 groups and conspiracies as well as the collection of evidence and the identification and use
20 of witnesses.

21 2. The following information contained within this criminal complaint is based
22 upon your Complainant's participation in this investigation or was provided to him by
23 other law enforcement personnel. I have not included every fact known to me concerning
24

1 this offense. I have set forth only the facts I believe are essential to establish the necessary
2 foundation for this complaint. All times noted are approximate.

3 **FACTS ESTABLISHING PROBABLE CAUSE**

4 3. On May 30, 2020, in Las Vegas, Nevada, large crowds gathered in multiple
5 areas of the Downtown area. A crowd arrived at the Lloyd D. George Courthouse, located
6 at 333 South Las Vegas Boulevard, Las Vegas, Nevada and the Foley Federal Building
7 (FFB), located at 300 South Las Vegas Boulevard, Las Vegas at approximately 10:15 p.m.
8 Participants in the protest became more boisterous, fireworks were set off, the walls near the
9 buildings were spray painted with obscenities and anti-law enforcement graffiti, and several
10 small bushes of the landscaping were lit on fire. Multiple individuals went to the east
11 entrance of the FFB. Individuals began to throw paint on the windows, kicked windows and
12 doors to damage or break them to make entry, spray painted windows, and attempted to
13 break windows with objects to include but not limited to: rocks, a hammer, metal bars, and
14 the metal letters torn off from the sign that read, "FOLEY FEDERAL BUILDING
15 UNITED STATES COURTHOUSE."

16 4. An on-duty Federal Protective Service (FPS) Protection Security Officer
17 (PSO) T.W., who was stationed inside the FFB, witnessed the damage and attempted break-
18 in at the building. T.W. stated the crowd outside could see him inside the building and T.W.
19 heard persons saying, "Get him!" and "Get the cop!" T.W. was in fear of the crowd
20 breaking through the windows and door, and was in fear of the potential actions of the
21 individuals against his person if they successfully made entry. Ultimately, additional police
22 units arrived inside the building and the crowd was dispersed. Some letters torn from the
23 FFB were taken by individuals and not recovered. The Lloyd D. George Federal
24 Courthouse was also damaged during this time.

1 5. On June 3, 2020, the General Services (GSA) completed a damage estimate
2 for the repair and clean-up of the FFB property. The estimate totaled seventy one thousand
3 three hundred thirty five dollars and seventy-two cents (\$71,335.72).

4 6. The FFB was equipped with surveillance cameras on the exterior of the
5 building which captured footage of individuals who damaged the building on May 30, 2020.
6 One individual who was captured on the surveillance footage damaging the FFB was later
7 positively identified by investigators as JEANETTE RENEE WALLACE (hereinafter
8 referred to as "WALLACE").

9 7. Your Complainant received video surveillance from the FFB of the incident
10 from the United States Marshals Service. Your Complainant also viewed multiple social
11 media videos where footage of the protest and damage done to the FFB was posted. While
12 reviewing FFB surveillance footage and social media video posts, your Complainant
13 observed WALLACE, a black female adult, wearing an orange jacket, gold necklace, and
14 blue jeans with two slits or rips in the back of the thighs. WALLACE had long braided
15 blonde highlighted hair. WALLACE was observed in the FFB video footage damaging or
16 attempting to damage the building. WALLACE was not wearing a mask or face covering
17 when captured by security cameras.

18 8. On Camera 19 of the FFB footage at approximately 22:20:22 and 22:20:31,
19 WALLACE was observed kicking a window near the revolving door (east side).
20 WALLACE kicked the window approximately six times. On Camera 9 of the FFB
21 surveillance video, WALLACE was observed picking up and throwing what appeared to be
22 a rock or rocks at the windows of the FFB at 22:20:57, 22:21:06 and 22:21:49. At 22:22:13,
23 WALLACE was observed throwing what appeared to be a paint can at the windows.

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2 ...

3 ...

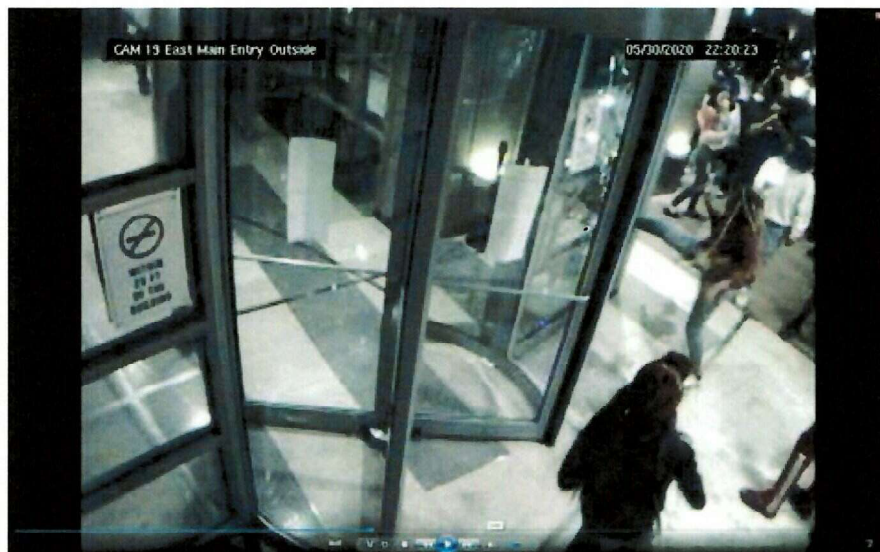


Image #1 – 05/30/2020 - Foley Federal Building Security Camera 19, WALLACE kicking window.



Image #2 – 05/30/2020 - Foley Federal Building Security Camera 19, WALLACE kicking window.



9 Image #3 – 05/30/2020 - Foley Federal Building Security Camera 09, WALLACE
10 throwing what appears to be a rock at the window.



19 Image #4 – 05/30/2020 - Foley Federal Building Security Camera 09, WALLACE
20 holding what appears to be a paint can.
21
22
23
24



Image #5 – 05/30/2020 - Foley Federal Building Security Camera 09, WALLACE throwing what appears to be a paint can.

9. WALLACE was observed in multiple social media videos which captured the protests. Within these videos, WALLACE's actions at the FFB and other locations in the Downtown Las Vegas area were recorded.

10. Screenshots of WALLACE were taken from a video on YouTube titled "Black Lives Matter Las Vegas Protest Ends In Riot! 2020" posted by "WorldWideLeanTrunks." At the 14:25 mark of the video, WALLACE was observed and begins talking. The video is filmed in a different location than the FFB, however, WALLACE is wearing the same clothes she wore while at the FFB. The screenshots were submitted to the Las Vegas Metropolitan Police Department (LVMPD) facial recognition program, which is operated by trained individuals assigned to LVMPD's Technical Operations Section.

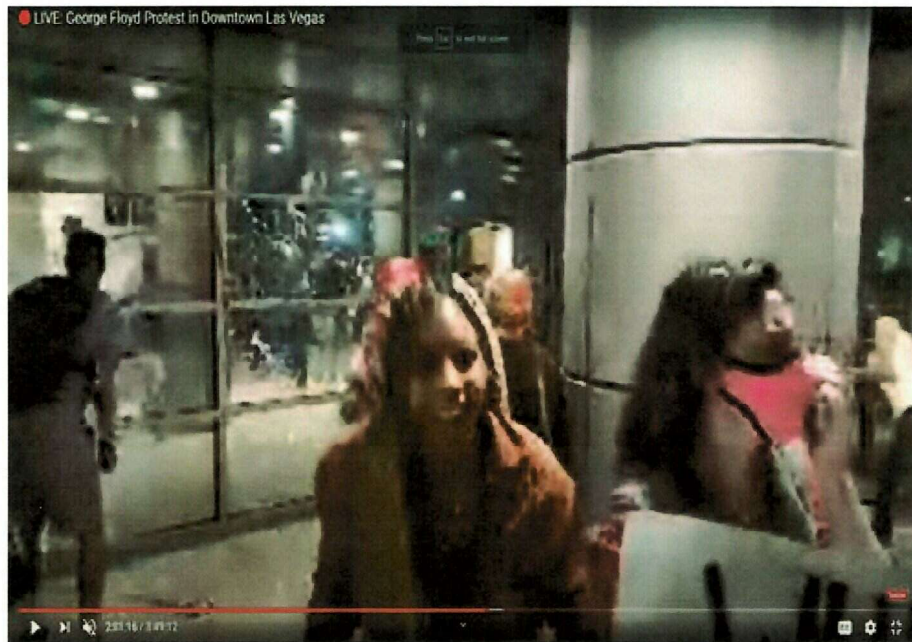


Image #6 – 05/30/2020 - from “Abandoned Explained” video, WALLACE in front of Foley Federal Building.

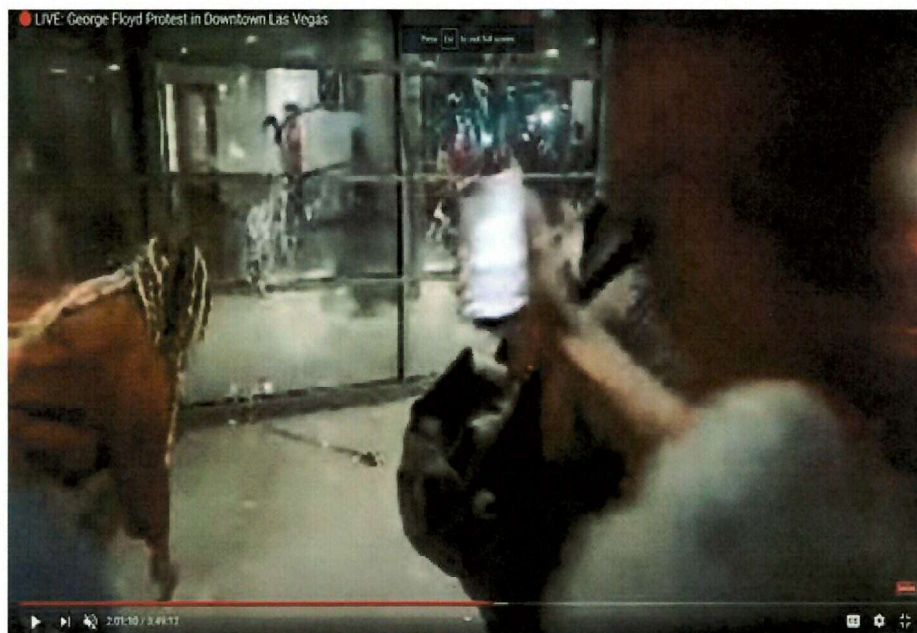


Image #7 – 05/30/2020 - from “Abandoned Explained” video, WALLACE picking up what appeared to be a rock.

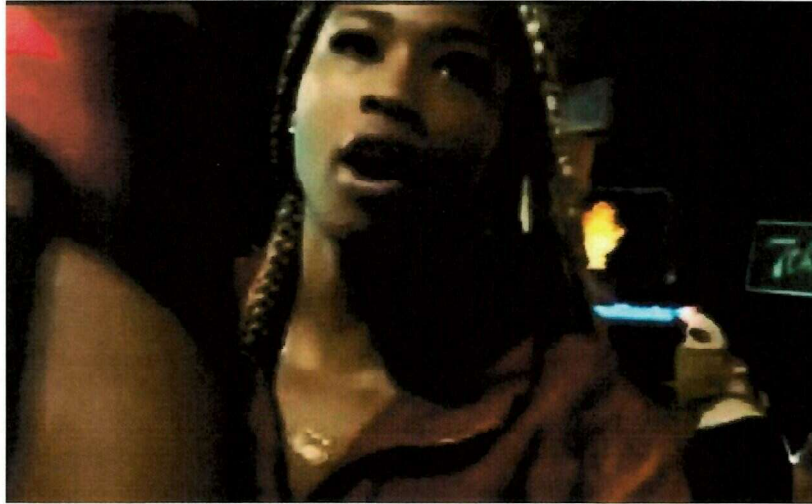


Image #8 – 05/30/2020 - from “WorldWideLeanTrunks” video, WALLACE (image was submitted to LVMPD Facial Recognition).

11. On June 24, 2020, the FBI received responses from LVMPD facial recognition of a possible match of the submitted photos to WALLACE. Upon further review of the possible match to WALLACE, it was discovered WALLACE had a Facebook profile under the name "January Renee," the profile link was <https://www.facebook.com/jeanette.wallace.96>, and information on the profile was publicly viewable. On her page she posted videos of her at the protest in Las Vegas the previous night, May 29, 2020. In those videos she recorded herself on camera. WALLACE had the same likeness and hair as the subject in the FFB damage. WALLACE posted a photograph of herself making an obscene gesture (extending her middle finger) next to spray paint on a wall which read, "FUCK THE POLICE." In the photo WALLACE was wearing the same orange jacket, jeans, had the same braided blonde highlighted hair as the female captured on video damaging the FFB. Additionally, in a picture posted by WALLACE to her Facebook, she appeared to wear the same necklace as the female on the video damaging the FFB on May 30, 2020.

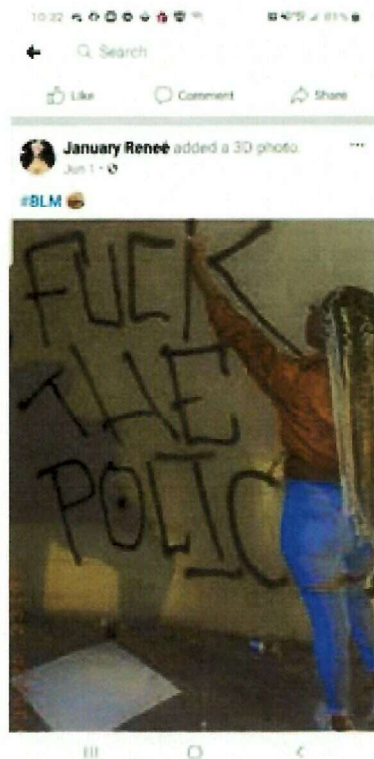


Image #9 – 06/01/2020 - from Facebook page “January Renee,” same clothing and physical appearance as when WALLACE was at Foley Federal Building.

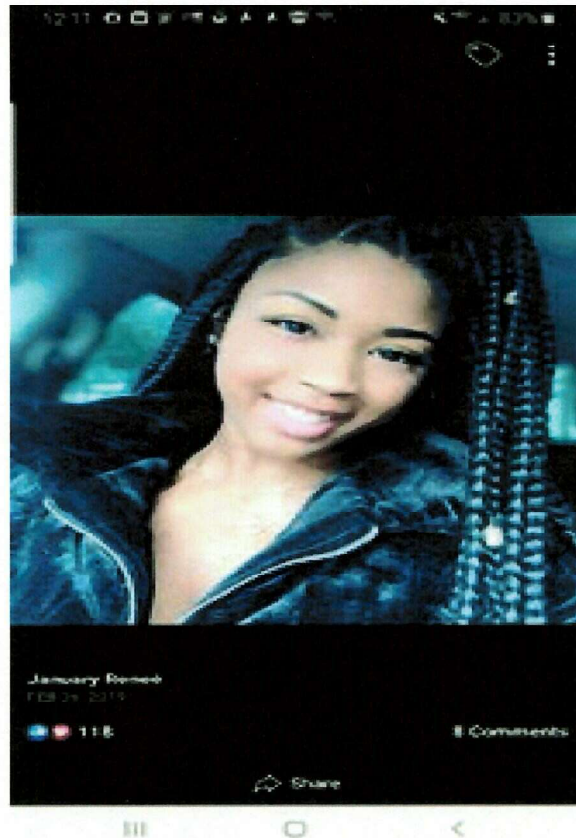


Image #10 – 02/26/2019 - from Facebook page “January Renee,” necklace is visible.

12. On August 3, 2020, agents executed a federal search warrant of WALLACE’s residence. Agents located the items of clothing WALLACE wore while damaging the FFB on May 30, 2020. This included her orange jacket, jeans with rips or slits in the thighs, white Vans shoes, blonde and brown hair extensions and her necklace which read, “Netty.” WALLACE was present at the residence when the search was conducted.

13. In a post-*Miranda* interview, WALLACE admitted to damaging the FBB on May 30, 2020. WALLACE was shown multiple still images obtained from FFB security cameras and social media videos and webpages (including images 1, 3, 4, 5, 6, 8, 9, 10). WALLACE identified herself and admitted it was her in all of the images.

15. Based on the foregoing facts and information, Your Complainant believes there is probable cause to believe that JEANETTE RENEE WALLACE did commit a violation of 18 U.S.C. § 1361 – Depredation Against Property of the United States.


Special Agent Joseph Dick
Federal Bureau of Investigation

Attested to by the Applicant in accordance with the requirements of Fed. R. Crim. P. 41
by telephone on this 6th day of August, 2020.

THE HONORABLE DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

